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11 *Attorneys for Defendant*
12 *Bunga Bunga LLC*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LUIS PONCE, an individual, and ON
16 BEHALF OF OTHERS SIMILARLY
17 SITUATED,

Case No. 2:19-cv-02002-KJD-VCF

18 Plaintiffs,

19 **STIPULATION TO EXTEND
20 DEADLINE FOR DEFENDANT TO
21 RESPOND TO PLAINTIFFS'
22 COMPLAINT
(FOURTH REQUEST)**

vs.

23 BUNGA BUNGA LLC, a domestic limited-
24 liability company,

25 Defendant.

26 IT IS HEREBY STIPULATED by and between Plaintiff Luis Ponce (“Plaintiff”), through
27 his counsel Lagomarsino Law, and Defendant Bunga Bunga LLC (“Defendant”), through its
28 counsel Jackson Lewis P.C., that Defendant shall have a three-week extension up to and including
Friday, April 3, 2020, in which to file a response to Plaintiff’s Complaint. This Stipulation is
submitted and based upon the following:

1. Defendant’s response to the Complaint is currently due on Friday, March 13, 2020.
2. The Parties are actively engaged in settlement negotiations of this class action case. The Parties have conducted necessary analysis in order to meaningfully discuss settlement and to exchange settlement offers. The Parties are continuing to negotiate and exchanging settlement offers. The Parties believe a settlement in this case can be reached with sufficient time to conclude the negotiations. In the interest of avoiding litigation and unnecessary expenditure of

1 resources, the parties are requesting a three-week extension of the deadline for Defendant to
2 respond to the Complaint.

3 3. This is the fourth request for an extension of time for Defendant to file a response
4 to Plaintiff's Complaint.

5 4. This request is made in good faith and not for the purpose of delay.

6 5. Nothing in this Stipulation, nor the fact of entering into the same, shall be
7 construed as waiving any claim and/or defense held by any party.

8 Dated this 12th day of March, 2020.

9 LAGOMARSINO LAW

10 *s/ Andre M. Lagomarsino*

11 Andre M. Lagomarsino, Bar No. 6711
12 3005 W. Horizon Ridge Pkwy., Suite 241
13 Henderson, Nevada 89052

14 *Attorney for Plaintiff*

9 JACKSON LEWIS P.C.

10 *s/ Daniel I. Aquino*

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13 300 S. Fourth Street, Ste. 900
14 Las Vegas, Nevada 89101

15 *Attorneys for Defendant*

16 **ORDER**

17 IT IS SO ORDERED:



18 _____
19 United States Magistrate Judge

20 3-13-2020

21 Dated: _____